REMARKS

The Office Action dated September 11, 2002 rejected claims 1, 3, 5-12, 14 and 16 under Section 102(e) as anticipated by Shiota et al. (USPN 6,324,521). Claim 13 was rejected as unpatentable over Shiota, while Claims 2, 4, 15 and 17-20 were rejected under Section 103(a) as unpatentable over Shiota and Tackbary (USPN 6,092,054).

Applicant has carefully reviewed Shiota and Tackbary, and respectfully traverses the Section 102 and 103 Rejections, as discussed below.

The Section 102 Rejections

Shiota was cited as a Section 102 prior art where the examiner asserts that each and every element of the claims is present in Shiota. However, Shiota does not show the specifics of how image orders are sent to multiple recipients.

Shiota relates to a network photograph service system with at least one laboratory server which has a communication ability via a network and is installed in a laboratory having a picture printer, and a center server installed in a service center which receives a printing service order via the network. The center server carries out processing including the steps of storing a picture recorded by a customer of each laboratory as digital image data, making the digital image data accessible on the network, selecting one laboratory to output a print among the laboratories in response to order information transferred from the customer via the network, and providing a printing service requested by the order to the customer by transmitting instructing information to the laboratory server installed in the selected laboratory.

The Office Action notes that Shiota teaches a computer implemented method of distributing cards to a plurality of recipients. Specifically, page 3 of the Office Action asserted that

> col. 11, line 38 – Col. 12, line 24 discloses that there are a plurality of recipients (customer and his/her friend). Also see Fig. 1 (6-PC correspond to a plurality of recipients).
>
> For each of the plurality of recipients specified in the received card order, printing at least one card having at least one uploaded image from the recipient's

image set and distributing the printed cards having the recipient's uploaded images to their respective associated recipients (col. 11, lines 38-col. 12, line 24. Customer and his friend are the plurality of recipients and prints (which could be photograph/postcards/picture postcards as disclosed in col. 3, liens 31-35 and col. 4, lines 28-32) with uploaded images are distributed to customer and to the customer's friend).

However, the above citation does not show how image orders are sent to multiple recipients. While Shiota does show a plurality of recipients, Shiota does not show claim 1's receiving a card order specifying a plurality of recipients. Although Shiota's Fig. 1 shows a plurality of PCs, there is no showing that each PC can issue a single card order that specifies a plurality of recipients. Fig. 2 of Shiota shows that each order relates to one recipient with one recipient address. Thus, in Shiota, a user places multiple orders, each time the user can specify a different single recipient. Fig. 3 of Shiota shows the resulting order file with two recipients when the user places the order twice. Shiota also discusses an example showing that multiple prints may be ordered. However, the discussion below is silent on whether the customer can order for all recipients at once or one recipient at a time:

> After the customer returns, he/she accesses the center server 12 from the personal computer 6 at home and orders extra prints of these pictures (105). At this time, for example, among the pictures whose first prints were ordered from the minilab 3a, an extra print of a picture a is ordered for the customer while a picture b is for the friend, and among the pictures whose first prints were ordered from the minilab 3b, an extra print of a picture c is ordered for the customer.
>
> As for the pictures for the customer, the minilab 3a is specified as the laboratory at which the prints are received. As for the picture for the friend, mailing may be specified as the method to receive the print. However, in the case of air mail, it takes more than one day for the print to reach the friend. On the other hand, if an order is carried out with the friend being specified as the recipient and the laboratory 3b as the laboratory at which the print is received, the print can reach the friend on the day of the order at the earliest.

Because Shiota's Fig. 2 shows one recipient designation at a time, the only logical conclusion one can reach is that at one sitting, the user specifies three orders for three recipients. In contrast, Claim 1 recites:

> receiving a card order specifying a plurality of recipients and, for each specified recipient, a set of one or more uploaded images associated with that recipient;
>
> for each of the plurality of recipients specified in the received card order, printing at least one card having at least one uploaded image from the recipient's image set; and
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> distributing the printed cards having the recipients' uploaded images to their respective associated recipients.

Here, the user can specify in a single order a plurality of recipients rather than specifying multiple times, each time a recipient. As discussed on pages 11-12 of the instant specification, the invention is advantageous over Shiota with one or more of the following advantages:

> The systems and techniques described here provide intuitive and convenient mechanisms that allow a user to order prints of images and have the prints distributed to multiple recipients at different locations with a minimum of time, trouble and expense on the part of the ordering user. For example, in a single ordering sequence, a user can specify a set of one or more prints and have them distributed to multiple different recipients. As a result, the user need not reenter redundant information – for example, identifying the images to be printed, supplying payment information, and the like – as otherwise would be required if the print order was limited to a single shipping destination. Moreover, by allowing a user to specify multiple recipients within a single print order, the user is not subjected to a minimum dollar amount for each of several different orders. Rather, because multiple recipients are allowed, the user is better able to satisfy

the minimum dollar amount without being forced to order more prints than otherwise would be desired.

In addition, because an order can designate multiple recipients, the user need not incur multiple charges on a credit card or other financial instrument when ordering prints for multiple recipients. Furthermore, by allowing the user to specify different print parameters (e.g., size, number of copies, finish) for each of the individual recipients, flexibility and convenience in the print ordering process are enhanced.

Moreover, users can distribute copies of prints to multiple recipients without having to incur the effort and expense involved in receiving print copies from a photofinisher, sorting the prints into sets according to destinations, putting the prints in protective envelopes, and then re-mailing the sets of prints to their respective recipients. As a result, sets of prints can be distributed to multiple destinations more quickly and with less expense and effort.

In addition, by employing a non-linear workflow model certain benefits and efficiencies are realized. More particularly, by taking a single multiple-recipient order, breaking it down into sub-orders corresponding to a single recipient, selectively instantiating and re-organizing multiple instances of designated images to build each sub-order, and then printing each sub-order as a separate run of prints for the associated recipient, a single print order (transaction sequence) can be used to order prints to be generated and distributed to multiple recipients. Moreover, such a non-linear workflow tends to increase the efficiency and/or speed of the print generation and distribution tasks dramatically.

Since at least one element is missing in Shiota, Shiota cannot anticipate independent claims 1 and 21 or those dependent therefrom. For this reason, Shiota cannot anticipate claim 3. Additionally, claim 4 cannot be anticipated since Shiota does not show the specifics of print parameters that include one or more of print size, number of copies, print finish, and/or a textual message for the printed cards. With regard to claims 5-6, Shiota shows that a print service uploads images scanned from film.

However, there is no teaching in Shiota that a user directly uploads the images. Claims 7-8 are allowable in that they depend from allowable claim 1. With respect to claim 9, Shiota does not show the web front-end for a user and thus claim 9 is allowable over Shiota. With regards to claims 11-12, Shiota is silent on whether the card order comprises a single transaction sequence. Shiota also does not show a single transaction sequence terminated by a click of a "card order" button (see discussion of single order with multiple recipients above).

In sum, since one or more elements are missing in Shiota, Shiota cannot anticipate claims 1 and 21 and those dependent therefrom. Withdrawal of the Section102 rejection is respectfully requested.

The Section 103 Rejections

Claim 13 was rejected as unpatentable over Shiota, while Claims 2, 4, 15 and 17-20 were rejected under Section 103(a) as unpatentable over Shiota and Tackbary (USPN 6,092,054).

Tackbary shows a system for communicating with a card distribution center for selecting, ordering, and sending social expression cards using a personal computer. The user can enter names and addresses of card recipients into the system wherein the information is maintained in a database. The system displays digitized images of the cards on a display screen which are retrieved from a card database. From the cards displayed, the user can select cards for designated recipients and enter personalized messages and a digitized signature. The user may then send the order to a card distribution center, which processes the order, retrieves and prints the selected card images, including any user messages or user signature, and mails the cards to designated recipients or customers. The system maintains a database of all recipients, addresses, associated occasions and dates, card preferences, relationships and order history.

However, neither Shiota nor Tackbary shows the claimed element of receiving a card order specifying a plurality of recipients and, for each specified recipient, a set of one or more uploaded images associated with that recipient; for each of the plurality of recipients specified in the received card order, printing at least one card having at least

MARKED UP VERSION OF THE CLAIMS SHOWING CHANGES

21. (New) A computer-implemented method of distributing cards to a plurality of recipients, the method comprising:

receiving a card order from an orderer, such order specifying a plurality of recipients other than the orderer and, for each specified recipient, a set of one or more uploaded images associated with that recipient;

for each of the plurality of recipients specified in the received card order, printing at least one card having at least one uploaded image from the recipient's image set; and

distributing the printed cards having the recipients' uploaded images to their respective associated recipients.

one uploaded image from the recipient's image set; and distributing the printed cards having the recipients' uploaded images to their respective associated recipients.

Hence, Shiota and Tackbary, singly or in combination, cannot render claims 2, 4, 13, 15 and 17-20 obvious. Withdrawal of the Section 103 rejection is respectfully requested.

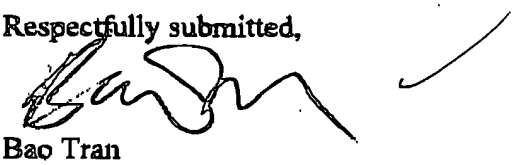
Conclusion

Applicants respectfully submit that all claims are in condition for allowance. Withdrawal of the objections and rejections is respectfully requested.

Authorization to charge Deposit Account 501861 is granted.

If for any reason the Examiner believes that a telephone conference would in any way expedite prosecution of the subject application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,



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